

Gregg A. Farley (State Bar No. 115593)  
LAW OFFICES OF GREGG A. FARLEY  
880 Apollo Street, Suite 222  
El Segundo, California 90245  
Telephone: (310) 445-4024  
Facsimile: (310) 445-4109

Sahag Majarian II (State Bar No. 146621)  
LAW OFFICES OF SAHAG MAJARIAN, II  
18250 Ventura Blvd.  
Tarzana, California 91356  
Telephone: (818) 609-0807  
Facsimile: (818) 609-0892

ORIGINAL

Attorneys for Plaintiff Jorge A. Mejia, appearing on behalf  
of himself and all others similarly situated

**UNITED STATES DISTRICT COURT**

**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

JORGE A. MEJIA, an individual,  
appearing on behalf of himself and  
all others similarly situated,

Plaintiff,

vs.

DHL EXPRESS (USA), INC., an  
Ohio corporation; and DOES 1-25,

Defendants.

Case No. 2:15-cv-00890-GHK-JC

**PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: June 20, 2016

Time: 9:30 a.m.

Ctrm: Hon. George H. King

**NOTICE OF MOTION AND MOTION**

TO DEFENDANT AND TO ITS ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on June 20, 2016, at 9:30 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 255 E. Temple Street, Los Angeles, California, in the Courtroom of the Honorable George H. King, Plaintiff Jorge A. Mejia ("Plaintiff") will and hereby does move, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an order granting preliminary approval to the proposed class action settlement in this case entitled Stipulation and Agreement of Compromise, Settlement and Release ("Settlement Agreement" or "Settlement"), including:

- (1) preliminarily approving of the Settlement as being fair, reasonable and adequate for the class ("Class");
- (2) provisionally certifying the Class under Rule 23 of the Federal Rule of Civil Procedure for settlement purposes only;
- (3) approving the form, manner and content of the notice of settlement ("Class Notice") to be disseminated to the Class;
- (4) appointing Plaintiff as class representative ("Class Representative");
- (5) appointing Gregg A. Farley of the Law Offices of Gregg A. Farley and Sahag Majarian, II, of the Law Offices of Sahag Majarian as counsel for the Class ("Class Counsel"); and
- (6) setting the date and time of the final approval hearing ("Fairness Hearing").

This motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declarations of Gregg A. Farley, Sahag Majarian and Plaintiff, the proposed Order Granting Preliminary Approval of Class Action Settlement, the pleadings and papers on

1 file herein and upon such other matters as may be presented to the Court at the  
2 time of the hearing.

3 This motion is made following the conference of counsel pursuant to  
4 L.R. 7-3 which took place on April 26, 2016.

5 DATED: May 23, 2016

LAW OFFICES OF GREGG A. FARLEY

6 By: Gregg A. Farley

7 Gregg A. Farley

8 Attorneys for Plaintiff Jorge A. Mejia,  
9 appearing on behalf of himself and all others  
10 similarly situated  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28